



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



KEITH CREAGH  
DIRECTOR

July 6, 2016

CERTIFIED MAIL

Mr. David Sproul  
State of Michigan  
Department of Technology Management and Budget  
General Office Building – 2B  
7150 Harris Drive  
Dimondale, Michigan 48821

Mr. Tom Jasper  
Andy J. Egan Company  
2001 Waldorf NW  
Grand Rapids, Michigan 49544

Mr. Edward Vallad  
State of Michigan, Department of Corrections  
206 East Michigan Avenue  
Lansing, Michigan 48909

Mr. Gregory F. Collins  
Energy Systems Group, LLC  
4655 Rosebud Lane  
Newburgh, Indiana 47630

Mr. Doug Melching  
Melching Incorporated  
16942 Woodlane Drive  
Nunica, Michigan 49448

SRN: U341604265

Dear Messrs. Sproul, Vallad, Melching, Jasper and Collins:

**VIOLATION NOTICE**

On May 13, 2016, the Michigan Department of Environmental Quality (DEQ), Air Quality Division (AQD), performed an asbestos inspection at 1342 West Main Street (Power Plant), Ionia, Ionia County, Michigan. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to my investigation, Mr. David Sproul of the State of Michigan Department of Technology Management and Budget and Mr. Edward Vallad of the State of Michigan Department of Corrections is the responsible person for the subject property, and Mr. Tom Jasper of Andy J. Egan Company and Mr. Gregory F. Collins of Energy Systems Group, LLC are responsible operators for the subject property and Mr. Doug Melching of Melching Incorporated is the contractor who performed the abatement & demolition activities at this location. The abatement occurred on or around April 27, 2016. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the investigation, staff observed the following:

The subject property had a boiler with RACM removed without a 10-day notification submitted and improperly removed.

Mr. David Sproul  
Mr. Edward Vallad  
Mr. Doug Melching  
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Mr. Tom Jasper  
Mr. Gregory F. Collins

Process Description	Section Violated	Comments
	§61.145(b)(3)(i)	Failure to provide notice prior to asbestos work
	§61.145(c)(3)	Failure to wet during stripping
	§61.145(c)(4)	Failure to contain in leak tight container
	§61.145(c)(6)(i)	Failure to wet RACM that has been stripped
	§61.150(a)(1)(iii)	Failure to seal while wet
	§61.150(a)(1)(v)	No generator labels
	§61.150(c)	No signs during loading and unloading

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by July 27, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation, and the date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The signed written response from both owner and operator to this violation notice may be submitted by mail and directed to my attention at; DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909 or scanned and sent as an email attachment to [brownj9@michigan.gov](mailto:brownj9@michigan.gov).

If you believe the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation extended to me during our meeting and emails. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-599-7825; [brownj9@michigan.gov](mailto:brownj9@michigan.gov); or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Jeremiah Brown  
Environmental Quality Analyst  
Air Quality Division

cc: Ms. Lynn Fiedler, MDEQ  
Ms. Teresa Seidel, MDEQ  
Ms. Heidi Hollenbach, MDEQ  
Ms. April Lazzaro, MDEQ  
Mr. Tom Hess, MDEQ  
Mr. Jason Wolf, MDEQ  
Ms. Karen Kajiya-Mills, MDEQ